General
Communication
Incorporated

April 3, 1997

HAND DELIVERY

William F. Caton
Federal Communications Commission
1919 M St., NW
Washington, DC 20554

Re: General Communication, Inc.
Ex Parte Report, CC Dockets 96-45, 96-262

Dear Mr. Caton:

General Communication, Inc. (GCI) hereby gives notice of an ex parte contact. Kathy Shobert of GCI met with Jim Coltharp of Commissioner Quello's office to discuss the attached and its position in the above captioned proceedings.

Sincerely,

Kathy L. Shobert
Director, Federal Affairs

cc: Jim Coltharp

901 15th Street N.W. • Suite 900 • Washington, DC 20005 • 202/842-8847

INTERCONNECTION REQUESTS

Company	Access Lines
Fairbanks Municipal Utilities System	**32,351**
Telephone Utilities of Alaska	**26,718**
Douglas	1,298
Eielson A.F.B.	2,139
Ft. Wainwright	3,029
Juneau/Lemon Creek	10,872
Sterling	9,380
Telephone Utilities of the Northland	**40,982**
Delta Junction/Ft. Greely	1,675
Homer	5,787
Kenai	5,837
Kodiak	6,942
Nenana	371
Ninilchik	606
North Kenai	2,055
North Pole	8,484
Seldovia	320
Soldotna	8,905

April 2, 1997

Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501

Dear Commissioners:

Attached please find a copy of our bona fide request, dated April 2, 1997, to Fairbanks Municipal Utilities System ("FMUS"), for interconnection services and network elements. As you know, FMUS is classified as a "Rural Telephone Company" under the terms of the Telecommunications Act of 1996. The request, and this notice are presented under the terms of Sections 251 and 252 of the Act.

If you have any questions regarding this notice, please feel free to call me at 265-5664. Thank you for your time and attention.

Sincerely,

Mark R. Moderow

Attachment

April 2, 1997

Mr. Frank Biondi, General Manager
Fairbanks Municipal Utilities System
645 Fifth Avenue
Fairbanks, AK 99707

Re: Interconnection for Local Services

Dear Mr. Biondi:

This correspondence will serve to request that Fairbanks Municipal Utilities System ("FMUS") begin good faith negotiations towards voluntary agreement for interconnection, services and network elements necessary for GCI Communication Corp., ("GCI") to provide local telecommunications services in the Fairbanks area. This letter constitutes a bona fide request for such interconnection, services and network elements under both the terms of the Telecommunications Act of 1996 (the "Act") and AS 42.05.311. To ascertain the final terms and network configurations, it will be necessary to negotiate wholesale prices for telecommunications services to be resold at just and reasonable prices, and for other interconnection and network elements. In order to facilitate the start of negotiations, this letter sets forth necessary terms and conditions for resale interconnection and network element interconnection separately.

RESALE INTERCONNECTION TERMS

Under the Act, FMUS must offer for resale at wholesale rates any telecommunications service that it provides at retail to subscribers who are not telecommunications carriers. Such rates should be based upon retail rates, less any portion attributable to marketing, billing, collection, overhead or other costs that will be avoided by FMUS. GCI proposes that FMUS provide, for resale at wholesale rates any telecommunications service that FMUS provides at retail to customers who are not telecommunications carriers, including not only current tariffed services,

but also any promotional services offered for a period of more than 90 days, discounted services, "grandfathered" services still being provided, bundled service offerings and special contract services. GCI will agree not to resell residential services to nonresidential end users, nor to resell Lifeline or any other means-tested service to end users not eligible to subscribe to such service offerings. Services provided for resale shall be equal in quality, subject to the same conditions, and provided within the same time intervals (i.e. provisioning, installation or repair) that FMUS provides these services to others, including end users.

UNBUNDLED NETWORK ELEMENT INTERCONNECTION

Under the Act, FMUS must also provide, to requesting telecommunications carriers, interconnection and unbundled access to network elements, at any technically feasible point, on rates, terms, and conditions that are just, reasonable and nondiscriminatory. This must also include appropriate outage terms (such as credits and restoral priorities) and other appropriate non-rate terms. In combination with resale, discussed above, interconnection with GCI's local facilities and unbundled access to certain FMUS network elements can serve to allow the provisioning by GCI of competitive local telecommunications services. The points and types of interconnection and access, for which terms and pricing are requested, include the following

Unbundled Loop Elements

Unbundled loops include any and all elements that provide the connection, at all levels, between the end user customer's premises and the central office subscriber main distributing frame (or its equivalent) serving the end user. Unbundled loops must be available to support Voice Grade subscriber services and services such as ISDN, that require that facilities be free of intrusive devices such as load coils or bridge taps.

1. Network Interface Device: The device used to establish connection between the end user's inside wiring and the unbundled loop element.

2. Loop: The physical facility connecting the Network Interface Device to the central office subscriber main distributing frame (or its equivalent). In cases where line concentration equipment is used, such as Digital Loop Carrier (DLC) architecture, the loop is considered to be the physical facility between the Network Interface Device and the MDF at the central office (or its equivalent). In cases where remote switching equipment is used, and frame space or entrance facility are not constrained, the loop is considered to be the physical

facilities between the Network Interface Device and the remote switching facility MDF (or its equivalent).

Unbundled Switching Elements

Unbundled switching includes any and all elements of a central office switch and/or remote switching systems through which an end user's loop is connected to a network to create a desired communication path between the end user and another point based on signals originated by the end user.

1. Local Switching: The hardware (trunk-side and line-side access) and software necessary to create a desired communication path between the end user and another point based on signals originated by the end user. Local Switching includes all features, functions, and capabilities of the switch, which include, but are not limited to the basic switching function of connecting lines to lines, lines to trunks, trunks to lines, and trunks to trunks, as well as the same basic capabilities made available to the FMUS' customers, such as a telephone number, white page listing, and dial tone and all other features that the switch is capable of providing, including but not limited to, the provision of billing information (end user and access), custom calling, custom local area signaling service features, and Centrex, as well as any technically feasible customized routing functions provided by the switch.

2. Local Tandem Switching: The hardware and software necessary to connect a central office switch to another central office switch or to another point based on routing instructions received by the local tandem switch. Local Tandem Switching includes the basic switching function of connecting trunks to trunks and all other functions that are centralized in tandem switches (as distinguished from separate end-office switches), including but not limited to call recording, the routing of calls to operator services, and signaling conversion features.

Unbundled Transport Elements

Unbundled transport includes any and all physical facilities (dedicated or shared), hardware and software used to connect central office switches, local tandem switches, remote switches, and other networks in any combination required to provide a requested service. Such connection shall include connection to equipment designated by the requesting telecommunications carrier and the provision of requested services shall include obtaining the functionality provided by digital cross-connect systems and multiplexing systems in the same manner that the

FMUS provides such functionality to interexchange carriers. Transport elements include, but are not limited to, rights-of-way, utilidors and utiliwalks, conduit, poles, physical strand support, microwave dishes and towers, as well as all radio, fiber and copper transport facilities. Such facilities may be "dark" or may include any electronics employed, whether microwave, copper or fiber based, and employing any multiplexing scheme or transmission protocol.

Collocation

GCI requests a discussion as to physical collocation of GCI equipment necessary for interconnection or access to unbundled network elements within existing wire centers. GCI requests discussion as to virtual collocation to any remaining FMUS wire centers for interconnection and access to unbundled elements, where physical collocation is not, for any reason, negotiated.

1. Physical Collocation: All necessary floor space, power, heating, air conditioning, climate control, fire control, lighting, security, and safe, secure access to locate equipment and facilities within central offices and wire centers, or remote installations, such as remote switching systems, digital loop and subscriber loop carriers, and fiber and other transport nodes, used to connect to facilities, or hardware provided by an entity for itself or to facilities or hardware provided by the LEC in any combination. No restrictions may be placed on the type or manufacturer of equipment or facilities used so long as the equipment or facilities comply with FCC Rules and Regulations regarding the manufacture of equipment and generally accepted industry standards.

2. Virtual Collocation: The ability to connect transmission facilities provided by an entity to transmission facilities provided by the LEC at any point at which the LEC interconnects transmission facilities. No restrictions may be placed on the type or manufacturer of equipment or facilities used in such interconnection so long as the equipment or facilities comply with FCC Rules and Regulations regarding the manufacture of equipment and generally accepted industry standards.

Unbundled Directory Assistance and Directory Listings

Unbundled directory assistance includes the necessary hardware, software, information and databases to perform directory services, including the publication of directories.

1. Directory Platforms: The hardware and software used to provide directory services. Access to the platform (if any) will be provided in such a way so as to allow remote directory stations to be connected to the platform.

2. Directory Listings and Databases: The directory listings, as well as access to databases with information on individual telephone numbers, including the name, address, zip code, city (or other location identifier) and the ability to search for telephone numbers based on a name, address, or other location identifier.

Unbundled Operations Support Systems

Unbundled operations support systems are each of the systems, including the necessary hardware, software and databases, used in the ordering, provisioning, maintenance, testing, billing, and updating of network databases. As discussed below under quality of services, access to each of the operations support systems shall be provided through the use of an electronic interface where possible. Each operations support system must provide timely information the same as—the information FMUS provides to itself. In all cases, FMUS should discuss with GCI the steps necessary to provide access to electronic databases on a dedicated port basis, facilitating remote (off-site) access to said databases.

1. Ordering and Provisioning: The systems, databases, and procedures in which the LEC establishes a request for service, including all features and functions, assigns telephone numbers, schedules a date and time for installation (if access to a location is required or if a service call is required to activate service). This includes but is not limited to input to and appropriate retrieval of data from the service order input system, plant assignment records and the service order dispatch system. Where plant records are established and maintained in paper format only, access to current editions of those records, on site or telephonically by GCI, will also be provided on a routine and scheduled basis. Input capabilities must be provided into other databases which establish directory listings, populate LIDB, and update directory services databases upon provisioning of the end user's service. Input into databases to activate features and functions ordered by the end user must also be provided to fully implement the end user's service request.

2. Billing: The information recorded by the central office, adjunct processor, or centralized recording devices relating to calls from or to an end user's loop. Billing information shall be furnished on request and shall include all information necessary to bill the end user for calls it is required to pay for and

verify all information necessary to verify charges for services that GCI is required to pay for. FMUS will provide for the retrieval of data from the database in which FMUS stores customer information used to generate a bill to the end user based on the service and features and functions ordered by the end user. Billing information used to generate a bill for or to GCI would include, but not be limited to, data in the appropriate Automatic Message Accounting (AMA) records and the Carrier Access Billing System (CABS) databases.

3. Maintenance: The systems, databases, and procedures in which FMUS generates customer reported troubles, schedules appointments for work at end user premises, and schedules repair actions. Where trouble tickets are still tracked manually, access to those records regarding GCI end users should also be provided. Access to appropriate data from databases which monitor and report on the integrity of the FMUS network and can be used to inform end users of network problems impacting the end user's ability to complete calls to specific locations. Access to maintenance databases would include, but not be limited to, access to the trouble dispatch system and any network monitoring and trouble tracking systems. Where trouble tickets are still tracked manually, access to those records must also be provided.

4. Testing: The systems used by the LEC to isolate troubles and direct repair operations. The systems used by the LEC to routinely test individual parts of the network (loops, switches, transmission, and other functional parts of the network) and report on the performance of these individual parts. This section should be interpreted to require access to the systems, databases, and procedures listed above under maintenance. Line and trunk testing for GCI facilities shall be furnished on request, along with testing for any module or bay housing GCI lines and trunks.

5. Quality of service: Access to each of the operations support systems shall be provided through the use of electronic interfaces, or if such interfaces are not utilized by FMUS, then the best means practically available. Each operations support system must provide timely information, the same as or better than the information FMUS provides to itself. In all cases, FMUS should discuss with GCI the steps necessary to, as soon as possible, provide access to electronic databases on a dedicated port basis, facilitating remote (off-site) access to said databases.

   Support services provided relating to resale shall be equal in quality, subject to the same conditions, and provided within the same provisioning time intervals that FMUS provides these services to others, including end users. Support

services provided relating to unbundled network elements (i.e. assignment, installation or repair) shall be equal in quality, subject to the same conditions, and provided within the same provisioning time intervals that FMUS provides these services to itself or others, including end users.

FMUS should furnish to GCI comparative quality of service and network performance data, reporting FMUS vs. CLEC performance (average installation time, average outages, etc.) the same as or better than the information data that FMUS provides to itself.

NOTICE OF CHANGES

Whether competitive local services are provided by resale of telecommunications services or through the use of facilities (interconnected and/or unbundled), the Act requires FMUS to provide reasonable notice to GCI of changes in the information necessary for the provision of such services, as well as any of any other changes that would affect the interoperability of our respective facilities and networks. GCI would propose that FMUS provide GCI with notice regarding any network change that will affect GCI's performance or ability to provide service or will affect FMUS' interoperability with other service providers. Such notice shall be given to the public, including GCI, pursuant to the Regulations contained at 47 C.F.R. 51.325-335, and to GCI individually at regularly scheduled meetings between designated engineering representatives of the parties. FMUS shall give notice to GCI of its initial election of methods under 47 C.F.R. 51.329(a) and of any changes in such method. GCI also specifically requests pricing of any, and all systems training materials and support necessary to implement any such changes as part of such notice.

NUMBER PORTABILITY/DIALING PARITY

Under the Act, FMUS must provide number portability to subscribers and dialing parity to competing providers of local telecommunications services. In the event that these cannot be provided with existing software, GCI would propose that number portability, and dialing parity for 0+, 0-, 411, 555-1212, 844 etc., be instituted on an interim basis.

1. Number Portability: Proper implementation of Number Portability awaits industry consensus and is dependent on deployment of a Service Control Point-based Advanced Intelligent Network. Until such an industry plan for implementing local number portability is developed, and a network supporting such a plan is available at FMUS, GCI would propose implementing number

portability through the establishment of its own dedicated NXXs in each Wire Center, and the use of a Direct Inward Dialing-type solution, to support retention of existing numbers by current FMUS customers migrating to GCI, upon entry by GCI into local competition in FMUS service areas.

2. Dialing Parity: 'Dialing parity' means that a person that is not an affiliate of a local exchange carrier is able to provide telecommunications services in such a manner that customers have the ability to route automatically, without the use of any access code, their telecommunications to the telecommunications services provider of the customer's designation from among two or more telecommunications services providers (including such local exchange carrier.) GCI anticipates that FMUS' current capabilities can accommodate the provision of dialing parity.

RIGHTS-OF-WAY

In addition to the collocation described above, FMUS shall provide GCI with non-discriminatory access to any pole, duct, conduit, utilidors/walk or rights-of -way (including fee property) owned or controlled by it. Non-discriminatory access shall include any use to which FMUS puts such facilities or property, including the placement of equipment, including remote terminals, on property owned or controlled by FMUS. In order to facilitate negotiations and finalize facilities plans, it is necessary that GCI be provided adequate information regarding the placement and fill as to these facilities, especially as they relate to the interconnection and access points referenced above.

RECIPROCAL COMPENSATION

Finally, FMUS and GCI must negotiate and establish reciprocal compensation arrangements for the transport and termination of telecommunication traffic between the networks. This reciprocal compensation arrangement must be just and reasonable, such that the terms and conditions provide for the mutual and reciprocal recovery of costs associated with the transport and termination on the respective facilities of calls originating on the facilities of the other. Further, the terms and conditions must be based upon a reasonable approximation of the additional costs of terminating such calls. GCI would propose that this reciprocal recovery be initially provided by a "bill-and-keep" arrangement as to any facilities affected, pending final network configuration.

Pursuant to the Act, a copy of this request is being furnished to the Alaska Public Utilities Commission. We look forward to your timely response to this request and the start of negotiations.

GCI COMMUNICATION, CORP.

By: 
Mark R. Moderow
Its: Corporate Counsel

cc: APUC
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501

April 2, 1997

Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501

Dear Commissioners:

Attached please find a copy of our bona fide request, dated April 2, 1997, to Telephone Utilities of Alaska, Inc., d/b/a PTI Telecommunications ("TUA"), for interconnection services and network elements. As you know, TUA is classified as a "Rural Telephone Company" under the terms of the Telecommunications Act of 1996. The request, and this notice are presented under the terms of Sections 251 and 252 of the Act.

If you have any questions regarding this notice, please feel free to call me at 265-5664. Thank you for your time and attention.

Sincerely,

Mark R. Moderow

Attachment

2550 Denali Street • Suite 1000 • Anchorage, Alaska 99503-2781 • 907/265-5600

April 2, 1997

Mr. John Erickson
Vice President, Alaska Operations
Telephone Utilities of Alaska, Inc.
d/b/a/ PTI Telecommunications
3940 Arctic Boulevard
Anchorage, AK 99503

Re: Interconnection for Local Services

Dear Mr. Erickson:

This correspondence will serve to request that Telephone Utilities of Alaska, Inc. ("TUA") begin good faith negotiations towards voluntary agreement for interconnection, services and network elements necessary for GCI Communication Corp., ("GCI") to provide local telecommunications services in the entire study areas encompassing Douglas, Eielson A.F.B., Ft. Wainwright, Juneau, Sterling, and Lemon Creek. This letter constitutes a bona fide request for such interconnection, services and network elements under both the terms of the Telecommunications Act of 1996 (the "Act") and AS 42.05.311. To ascertain the final terms and network configurations, it will be necessary to negotiate wholesale prices for telecommunications services to be resold at just and reasonable prices, and for other interconnection and network elements. In order to facilitate the start of negotiations, this letter sets forth necessary terms and conditions for resale interconnection and network element interconnection separately.

RESALE INTERCONNECTION TERMS

Under the Act, TUA must offer for resale at wholesale rates any telecommunications service that it provides at retail to subscribers who are not telecommunications carriers. Such rates should be based upon retail rates, less any portion attributable to marketing, billing, collection, overhead or other costs that will be avoided by TUA. GCI proposes that TUA provide, for resale at wholesale

rates, any telecommunications service that TUA provides at retail to customers who are not telecommunications carriers, including not only current tariffed services, but also any promotional services offered for a period of more than 90 days, discounted services, "grandfathered" services still being provided, bundled service offerings and special contract services. GCI will agree not to resell residential services to nonresidential end users, nor to resell Lifeline or any other means-tested service to end users not eligible to subscribe to such service offerings. Services provided for resale shall be equal in quality, subject to the same conditions, and provided within the same time intervals (i.e. provisioning, installation or repair) that TUA provides these services to others, including end users.

UNBUNDLED NETWORK ELEMENT INTERCONNECTION

Under the Act, TUA must also provide, to requesting telecommunications carriers, interconnection and unbundled access to network elements, at any technically feasible point, on rates, terms, and conditions that are just, reasonable and nondiscriminatory. This must also include appropriate outage terms (such as credits and restoral priorities) and other appropriate non-rate terms. In combination with resale, discussed above, interconnection with GCI's local facilities and unbundled access to certain TUA network elements can serve to allow the provisioning by GCI of competitive local telecommunications services. The points and types of interconnection and access, for which terms and pricing are requested, include the following:

Unbundled Loop Elements

Unbundled loops include any and all elements that provide the connection, at all levels, between the end user customer's premises and the central office subscriber main distributing frame (or its equivalent) serving the end user. Unbundled loops must be available to support Voice Grade subscriber services and services such as ISDN, that require that facilities be free of intrusive devices such as load coils or bridge taps.

1. Network Interface Device: The device used to establish connection between the end user's inside wiring and the unbundled loop element.

2. Loop: The physical facility connecting the Network Interface Device to the central office subscriber main distributing frame (or its equivalent). In cases where line concentration equipment is used, such as Digital Loop Carrier (DLC) architecture, the loop is considered to be the physical facility between the Network Interface Device and the MDF at the central office (or its equivalent).

In cases where remote switching equipment is used, and frame space or entrance facility are not constrained, the loop is considered to be the physical facilities between the Network Interface Device and the remote switching facility MDF (or its equivalent).

Unbundled switching elements

Unbundled switching includes any and all elements of a central office switch and/or remote switching systems through which an end user's loop is connected to a network to create a desired communication path between the end user and another point based on signals originated by the end user.

1. Local Switching: The hardware (trunk-side and line-side access) and software necessary to create a desired communication path between the end user and another point based on signals originated by the end user. Local Switching includes all features, functions, and capabilities of the switch, which include, but are not limited to the basic switching function of connecting lines to lines, lines to trunks, trunks to lines, and trunks to trunks, as well as the same basic capabilities made available to the TUA's customers, such as a telephone number, white page listing, and dial tone and all other features that the switch is capable of providing, including but not limited to, the provision of billing information (end user and access), custom calling, custom local area signaling service features, and Centrex, as well as any technically feasible customized routing functions provided by the switch.

2. Local Tandem Switching: The hardware and software necessary to connect a central office switch to another central office switch or to another point based on routing instructions received by the local tandem switch. Local Tandem Switching includes the basic switching function of connecting trunks to trunks and all other functions that are centralized in tandem switches (as distinguished from separate end-office switches), including but not limited to call recording, the routing of calls to operator services, and signaling conversion features.

Unbundled Transport Elements

Unbundled transport includes any and all physical facilities (dedicated or shared), hardware and software used to connect central office switches, local tandem switches, remote switches, and other networks in any combination required to provide a requested service. Such connection shall include connection to equipment designated by the requesting telecommunications carrier and the provision of

requested services shall include obtaining the functionality provided by digital cross-connect systems and multiplexing systems in the same manner that the TUA provides such functionality to interexchange carriers. Transport elements include, but are not limited to, rights-of-way, utilidors and utiliwalks, conduit, poles, physical strand support, microwave dishes and towers, as well as all radio, fiber and copper transport facilities. Such facilities may be "dark" or may include any electronics employed, whether microwave, copper or fiber based, and employing any multiplexing scheme or transmission protocol.

Collocation

GCI requests a discussion as to physical collocation of GCI equipment necessary for interconnection or access to unbundled network elements within existing wire centers. GCI requests discussion as to virtual collocation to any remaining TUA wire centers for interconnection and access to unbundled elements, where physical collocation is not, for any reason, negotiated.

1. Physical Collocation: All necessary floor space, power, heating, air conditioning, climate control, fire control, lighting, security, and safe, secure access to locate equipment and facilities within central offices and wire centers, or remote installations, such as remote switching systems, digital loop and subscriber loop carriers, and fiber and other transport nodes, used to connect to facilities, or hardware provided by an entity for itself or to facilities or hardware provided by the LEC in any combination. No restrictions may be placed on the type or manufacturer of equipment or facilities used so long as the equipment or facilities comply with FCC Rules and Regulations regarding the manufacture of equipment and generally accepted industry standards.

2. Virtual Collocation: The ability to connect transmission facilities provided by an entity to transmission facilities provided by the LEC at any point at which the LEC interconnects transmission facilities. No restrictions may be placed on the type or manufacturer of equipment or facilities used in such interconnection so long as the equipment or facilities comply with FCC Rules and Regulations regarding the manufacture of equipment and generally accepted industry standards.

Unbundled Directory Assistance and Directory Listings

Unbundled directory assistance includes the necessary hardware, software, information and databases to perform directory services, including the publication of directories.

1. Directory Platforms: The hardware and software used to provide directory services. Access to the platform (if any) will be provided in such a way so as to allow remote directory stations to be connected to the platform.

2. Directory Listings and Databases: The directory listings, as well as access to databases with information on individual telephone numbers, including the name, address, zip code, city (or other location identifier) and the ability to search for telephone numbers based on a name, address, or other location identifier.

Unbundled Operations Support Systems

Unbundled operations support systems are each of the systems, including the necessary hardware, software and databases, used in the ordering, provisioning, maintenance, testing, billing, and updating of network databases. As discussed below under quality of services, access to each of the operations support systems shall be provided through the use of an electronic interface where possible. Each operations support system must provide timely information the same as—the information TUA provides to itself. In all cases, TUA should discuss with GCI the steps necessary to provide access to electronic databases on a dedicated port basis, facilitating remote (off-site) access to said databases.

1. Ordering and Provisioning: The systems, databases, and procedures in which the LEC establishes a request for service, including all features and functions, assigns telephone numbers, schedules a date and time for installation (if access to a location is required or if a service call is required to activate service). This includes but is not limited to input to and appropriate retrieval of data from the service order input system, plant assignment records and the service order dispatch system. Where plant records are established and maintained in paper format only, access to current editions of those records, on site or telephonically by GCI, will also be provided on a routine and scheduled basis. Input capabilities must be provided into other databases which establish directory listings, populate LIDB, and update directory services databases upon provisioning of the end user's service. Input into databases to activate features and functions ordered by the end user must also be provided to fully implement the end user's service request.

2. Billing: The information recorded by the central office, adjunct processor, or centralized recording devices relating to calls from or to an end user's loop.

Billing information shall be furnished on request and shall include all information necessary to bill the end user for calls it is required to pay for and verify all information necessary to verify charges for services that GCI is required to pay for. TUA will provide for the retrieval of data from the database in which TUA stores customer information used to generate a bill to the end user based on the service and features and functions ordered by the end user. Billing information used to generate a bill for or to GCI would include, but not be limited to, data in the appropriate Automatic Message Accounting (AMA) records and the Carrier Access Billing System (CABS) databases.

3. Maintenance: The systems, databases, and procedures in which TUA generates customer reported troubles, schedules appointments for work at end user premises, and schedules repair actions. Where trouble tickets are still tracked manually, access to those records regarding GCI end users should also be provided. Access to appropriate data from databases which monitor and report on the integrity of the TUA network and can be used to inform end users of network problems impacting the end user's ability to complete calls to specific locations. Access to maintenance databases would include, but not be limited to, access to the trouble dispatch system and any network monitoring and trouble tracking systems. Where trouble tickets are still tracked manually, access to those records must also be provided.

4. Testing: The systems used by the LEC to isolate troubles and direct repair operations. The systems used by the LEC to routinely test individual parts of the network (loops, switches, transmission, and other functional parts of the network) and report on the performance of these individual parts. This section should be interpreted to require access to the systems, databases, and procedures listed above under maintenance. Line and trunk testing for GCI facilities shall be furnished on request, along with testing for any module or bay housing GCI lines and trunks.

5. Quality of service: Access to each of the operations support systems shall be provided through the use of electronic interfaces, or if such interfaces are not utilized by TUA, then the best means practically available. Each operations support system must provide timely information, the same as or better than the information TUA provides to itself. In all cases, TUA should discuss with GCI the steps necessary to, as soon as possible, provide access to electronic databases on a dedicated port basis, facilitating remote (off-site) access to said databases.

Support services provided relating to resale shall be equal in quality, subject to the same conditions, and provided within the same provisioning time intervals that TUA provides these services to others, including end users. Support services provided relating to unbundled network elements (i.e. assignment, installation or repair) shall be equal in quality, subject to the same conditions, and provided within the same provisioning time intervals that TUA provides these services to itself or others, including end users.

TUA should furnish to GCI comparative quality of service and network performance data, reporting TUA vs. CLEC performance (average installation time, average outages, etc.) the same as or better than the information data that TUA provides to itself.

NOTICE OF CHANGES

Whether competitive local services are provided by resale of telecommunications services or through the use of facilities (interconnected and/or unbundled), the Act requires TUA to provide reasonable notice to GCI of changes in the information necessary for the provision of such services, as well as any of any other changes that would affect the interoperability of our respective facilities and networks. GCI would propose that TUA provide GCI with notice regarding any network change that will affect GCI's performance or ability to provide service or will affect TUA's interoperability with other service providers. Such notice shall be given to the public, including GCI, pursuant to the Regulations contained at 47 C.F.R. 51.325-335, and to GCI individually at regularly scheduled meetings between designated engineering representatives of the parties. TUA shall give notice to GCI of its initial election of methods under 47 C.F.R. 51.329(a) and of any changes in such method. GCI also specifically requests pricing of any, and all systems training materials and support necessary to implement any such changes as part of such notice.

NUMBER PORTABILITY/DIALING PARITY

Under the Act, TUA must provide number portability to subscribers and dialing parity to competing providers of local telecommunications services. In the event that these cannot be provided with existing software, GCI would propose that number portability, and dialing parity for 0+, 0-, 411, 555-1212, 844 etc., be instituted on an interim basis.

1. Number Portability: Proper implementation of Number Portability awaits industry consensus and is dependent on deployment of a Service Control Point-based Advanced Intelligent Network. Until such an industry plan for

implementing local number portability is developed, and a network supporting such a plan is available at TUA, GCI would propose implementing number portability through the establishment of its own dedicated NXXs in each Wire Center, and the use of a Direct Inward Dialing-type solution, to support retention of existing numbers by current TUA customers migrating to GCI, upon entry by GCI into local competition in TUA service areas.

2. Dialing Parity: 'Dialing parity' means that a person that is not an affiliate of a local exchange carrier is able to provide telecommunications services in such a manner that customers have the ability to route automatically, without the use of any access code, their telecommunications to the telecommunications services provider of the customer's designation from among two or more telecommunications services providers (including such local exchange carrier.) GCI anticipates that TUA's current capabilities can accommodate the provision of dialing parity.

RIGHTS-OF-WAY

In addition to the collocation described above, TUA shall provide GCI with non-discriminatory access to any pole, duct, conduit, utilidors/walk or rights-of -way (including fee property) owned or controlled by it. Non-discriminatory access shall include any use to which TUA puts such facilities or property, including the placement of equipment, including remote terminals, on property owned or controlled by TUA. In order to facilitate negotiations and finalize facilities plans, it is necessary that GCI be provided adequate information regarding the placement and fill as to these facilities, especially as they relate to the interconnection and access points referenced above.

RECIPROCAL COMPENSATION

Finally, TUA and GCI must negotiate and establish reciprocal compensation arrangements for the transport and termination of telecommunication traffic between the networks. This reciprocal compensation arrangement must be just and reasonable, such that the terms and conditions provide for the mutual and reciprocal recovery of costs associated with the transport and termination on the respective facilities of calls originating on the facilities of the other. Further, the terms and conditions must be based upon a reasonable approximation of the additional costs of terminating such calls. GCI would propose that this reciprocal recovery be initially provided by a "bill-and-keep" arrangement as to any facilities affected, pending final network configuration.

Pursuant to the Act, a copy of this request is being furnished to the Alaska Public Utilities Commission. We look forward to your timely response to this request and the start of negotiations.

GCI COMMUNICATION, CORP.

By: 
Mark R. Moderow
Its: Corporate Counsel

cc: APUC
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501